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6 Attorneys for Plaintiff  
7 United States of America  
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10  
11 IN THE UNITED STATES DISTRICT COURT  
12 EASTERN DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,  
14 Plaintiff,  
15 v.  
16 JOSE GUADALUPE LOPEZ-ZAMORA,  
LEONARDO FLORES BELTRAN,  
CHRISTIAN ANTHONY ROMERO,  
JASON LAMAR LEE,  
BAUDELIO VIZCARRA, JR.,  
JOAQUIN ALBERTO SOTELO VALDEZ,  
RUDI JEAN CARLOS FLORES,  
ERIKA GABRIELA ZAMORA ROJO,  
ALEJANDRO TELLO,  
JAVIER HERNANDEZ,  
MATEO ELIAS GUERRERO-GONZALES,  
and  
JOSE LUIS AGUILAR SAUCEDO,  
17  
18 Defendants.

19 CASE NO. 2:21-CR-0007-MCE  
20 STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
[PROPOSED] FINDINGS AND ORDER

21 DATE: August 26, 2021  
TIME: 10:00 a.m.  
COURT: Hon. Morrison C. England, Jr.

22  
23 **STIPULATION**

24 Plaintiff United States of America, by and through its counsel of record, and the above-captioned  
25 defendants, by and through their respective counsel of record, hereby stipulate as follows:

- 26 1. By previous order, this matter was set for status on August 26, 2021.  
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1       2. By this stipulation, defendants now move to continue the status conference until  
2 December 9, 2021, and to exclude time between August 26, 2021, and December 9, 2021, under Local  
3 Codes T2 and T4.

4       3. The parties agree and stipulate, and request that the Court find the following:

5           a) The grand jury returned an indictment in this case on January 28, 2021. Fourteen  
6 defendants are named in the publicly filed indictment. The names of two additional defendants  
7 who have not yet been arrested are redacted from the publicly filed indictment.

8           b) On February 24, 2021, defendant Mateo Guerrero-Gonzales made his initial  
9 appearance in the case and was arraigned on the Indictment. ECF No. 111.

10          c) On March 5, 2021, defendant Javier Hernandez made his initial appearance in the  
11 case and was arraigned on the Indictment. ECF No. 123.

12          d) On April 13, 2021, defendant Baudelio Vizcarra, Jr. made his initial appearance in  
13 the case and was arraigned on the Indictment. ECF No. 137. On May 4, 2021, the Court signed  
14 an order substituting attorney Sanjay Sobti as counsel of record for defendant Vizcarra. ECF No.  
15 160.

16          e) On April 29, 2021, defendant Christopher Williams made his initial appearance in  
17 the case and was arraigned on the Indictment. ECF No. 153.

18          f) On May 11, 2021, the Court signed an order substituting attorney Kresta Daly as  
19 counsel of record for defendant Christian Romero. ECF No. 162.

20          g) The government has represented that the discovery associated with this case to  
21 date includes approximately 7,720 pages of materials, including investigative reports,  
22 photographs, search warrant materials, and other documents, as well as voluminous audio and  
23 video recordings and approximately 978 recorded phone calls intercepted pursuant to the Title III  
24 wiretap in this case. All of this discovery has been either produced directly to counsel and/or  
25 made available for inspection and copying.

26          h) Counsel for defendants need additional time to review the voluminous discovery  
27 in this case, to conduct independent factual investigation, to research trial and sentencing issues,  
28 to consult with their clients, and to otherwise prepare for trial.

1           i)       Counsel for defendants believe that failure to grant the above-requested  
2       continuance would deny them the reasonable time necessary for effective preparation, taking into  
3       account the exercise of due diligence.

4           j)       The government does not object to the continuance.

5           k)       In addition, this case is “complex” within the meaning of 18 U.S.C.  
6       § 3161(h)(7)(A), B(ii) [Local Code T2], as this Court previously found in its February 10, 2021  
7       Order (ECF No. 103) and subsequent orders.

8           l)       Based on the above-stated findings, the ends of justice served by continuing the  
9       case as requested outweigh the interest of the public and the defendant in a trial within the  
10      original date prescribed by the Speedy Trial Act.

11          m)       For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
12       et seq., within which trial must commence, the time period of August 26, 2021 to December 9,  
13       2021, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code  
14       T4] and 18 U.S.C. § 3161(h)(7)(A), B(ii) [Local Code T2] because it results from a continuance  
15       granted by the Court at defendant’s request on the basis of the Court’s finding that the ends of  
16       justice served by taking such action outweigh the best interest of the public and the defendant in  
17       a speedy trial.

18          4.       Nothing in this stipulation and order shall preclude a finding that other provisions of the  
19       Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
20       must commence.

21          IT IS SO STIPULATED.

1 Dated: August 20, 2021

PHILLIP A. TALBERT  
Acting United States Attorney

5 Dated: August 20, 2021

/s/ DAVID W. SPENCER  
DAVID W. SPENCER  
Assistant United States Attorney

6 Dated: August 20, 2021

/s/ Todd D. Leras  
Todd D. Leras  
Counsel for Defendant  
JOSE GUADALUPE LOPEZ-  
ZAMORA

7 Dated: August 20, 2021

/s/ Christopher R. Cosca  
Christopher R. Cosca  
Counsel for Defendant  
LEONARDO FLORES BELTRAN

8 Dated: August 20, 2021

/s/ Kresta N. Daly  
Kresta N. Daly  
Counsel for Defendant  
CHRISTIAN ANTHONY ROMERO

9 Dated: August 20, 2021

/s/ Olaf W. Hedberg  
Olaf W. Hedberg  
Counsel for Defendant  
JASON LAMAR LEE

10 Dated: August 20, 2021

/s/ Sanjay Sobti  
Sanjay Sobti  
Counsel for Defendant  
BAUDELIO VIZCARRA, JR.

11 Dated: August 20, 2021

/s/ Michael D. Long  
Michael D. Long  
Counsel for Defendant  
JOAQUIN ALBERTO SOTELO  
VALDEZ

12 Dated: August 20, 2021

/s/ Tasha P. Chalfant  
Tasha P. Chalfant  
Counsel for Defendant  
RUDI JEAN CARLOS FLORES

1 Dated: August 20, 2021

/s/ Martin Tejeda  
Martin Tejeda  
Counsel for Defendant  
ERIKA GABRIELA ZAMORA ROJO

2 Dated: August 20, 2021

/s/ Michael Jared Favero  
Michael Jared Favero  
Counsel for Defendant  
ALEJANDRO TELLO

3 Dated: August 20, 2021

/s/ Kelly Babineau  
Kelly Babineau  
Counsel for Defendant  
JAVIER HERNANDEZ

4 Dated: August 20, 2021

/s/ Eduardo Garnica  
Eduardo Garnica  
Counsel for Defendant  
MATEO ELIAS GUERRERO-  
GONZALES

5 Dated: August 20, 2021

/s/ Dina L. Santos  
Dina L. Santos  
Counsel for Defendant  
JOSE LUIS AGUILAR SAUCEDO

16 [PROPOSED] FINDINGS AND ORDER

17 IT IS SO FOUND AND ORDERED this \_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.  
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19  
20 THE HONORABLE MORRISON C. ENGLAND, JR.  
SENIOR UNITED STATES DISTRICT JUDGE  
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